

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of

Petition for Declaratory Ruling and Request
for Expedited Action on the July 15, 1997
Order of the Pennsylvania Public Utility
Commission Regarding Area Codes 412, 610,
215, and 717

NSD File No. L-97-42

Implementation of the Local Competition
Provisions of the Telecommunications Act of
1996

CC Docket No. 96-98

RESPONSE OF BELL ATLANTIC

The Commission should reject all petitions for reconsideration of this order. In recent years, the area code relief process has often taken far too long, with multi-year jeopardy situations becoming the norm rather than the rare exception, and consumers have suffered. State commissions need to focus their attentions on acting promptly on the area code relief proposals the industry puts before them. They should not squander their resources — and burden the industry with individual state proceedings and data requests — investigating number administration and optimization measures that are best handled consistently on a national level and that are beyond their jurisdictions.

The rules adopted by the Commission are a good step toward standardizing that process and should facilitate it throughout the country. They will also allow the industry to work toward consistent national number optimization solutions, without being distracted by inconsistent

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individual state initiatives. These rules are consistent with the Act and the jurisdictional divisions in it, are in the public interest and should not be changed.

Bell Atlantic¹ does, however, agree with certain of the constructions of the new rule offered by some of the petitioners. For example, this rule does not prevent states from proposing rate center consolidation. Nor does it restrict a state's ability to require a carrier to return numbering resources as part of the remedy against a carrier that has violated state law or rules. For example, if a commission decertificates a carrier in a state, the commission surely can require that carrier to return the NXX codes it has been assigned. Similarly, if a carrier has received NXXs to provide service in geographic areas in which the carrier is not authorized to do business, the state commission should be able to order their return. The Commission should make it clear, however, that states may not use this authority as a back-door way to order number pooling or otherwise engage in number administration.

The industry is working on ways to further standardize and expedite various aspects of the area code relief process. Standardization of the process will allow carriers to better plan for and meet customer requirements in the many states in which almost all carriers do business. The

¹ The Bell Atlantic telephone companies are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company and New England Telephone and Telegraph Company.

Commission should continue to support these efforts and should resist requests, like those in these petitions, that would lead instead toward Balkanization rather than standardization.

Respectfully submitted,


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Dated: February 4, 1999

CERTIFICATE OF SERVICE

I, Mary Liz Hepburn, hereby certify that on this 4th day of February 1999, a copy of the foregoing Bell Atlantic Response was served by US Mail on the following parties. Where indicated with an asterisk, service was via hand delivery.


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